

5.0

NARROWBAND PCS

The newly auctioned narrowband PCS frequencies allow two-way traffic. The current paging frequencies are only one-way. The new PCS frequencies position the paging industry to generate originating traffic terminating onto the PSTN. Paging carriers will evolve into full service network providers competing openly in the market with cellular, LEC, IXC, and voice mail providers. The DID arrangement currently provides the only gateway to service options for PCS; PIN arrangements will not support these services.

6.0

**SUBSCRIBER ACCESS DEGRADATION; INFERIOR DIALING AND
NON-STANDARD ACCESS**

In addition to making impossible or impracticable the provision of various advanced messaging services, the imposition of a PIN technology requirement for toll-free paging services also will place paging providers at a competitive disadvantage with LECs and other providers of messaging services. If the use of PIN technology is required, customers using voice mail services offered by paging carriers would be required to dial 18 digits, while the customers using the voice mail services offered by the LECs and others in the landline and wireless environments would be required to dial only a maximum of 11 digits.

As such, mandatory PIN paging arrangements can be compared to the Carrier Access Code (CAC) requirements that initially were imposed on the non-incumbent Interexchange Carriers. Under the CAC requirement, the caller was required to dial 5 extra digits to access the interexchange carrier network in order to complete long distance calls. The FCC long ago set a precedent on anticompetitive dialing conditions, as stated in the Carrier Access Code ruling involving the IXC's. Regulatory requirements imposed on a segment of the wireless industry, involving additional digits as part of an expanded dialing plan, would be similarly anticompetitive. Only the paging carriers are in a position to determine when PIN paging is a reasonable, competitive, and satisfactory business decision to impose on their subscribers. Any mandatory PIN dialing arrangement will severely hinder the paging industry from fairly competing in the expanding messaging and Personal Communications Services markets because of the burden of dialing additional digits to access the paging system's network.

In addition, the lack of universal access that would result from a mandatory PIN paging arrangement is a significant consideration. Currently, the public can dial from any telephone and be connected to a toll-free service that is accessed on a DID arrangement. PIN interconnection, in contrast, would allow calling from only those telephone devices which have touch-tone capabilities. This would prevent all rotary telephones, some payphones (which block the dialing of additional digits after the initial number) and some calls from foreign countries from using 800 toll-free service. Rotary

telephones still represent a significant portion of the telephones in service today. In a PIN environment, in order to serve rotary phones, a paging carrier would have to offer operator services to which the call would default after a number of seconds if the PIN were not received, increasing costs to paging providers and further undermining their competitiveness.

7.0

DID vs PIN -- OVERALL NETWORK EFFICIENCY

Although the use of PIN technology in conjunction with toll-free numbers may slow the rate of utilization of special access codes, the use of PIN technology also entails considerable efficiency costs. There are overall network efficiencies gained with DID arrangements that do not exist with PIN methods. All LEC 800 access service rates are based on network usage. PIN dialing arrangements take more network time for completion and are therefore more costly. See Figure 3 for an efficiency comparison of the two methods. The standard DID method is clearly the quickest fashion for completing a call on the PSTN. Furthermore, as a direct result of longer holding times, paging carriers require more equipment and interconnection trunks to handle calls placed in a PIN dialing arrangement. Naturally if the paging carrier needs more equipment, the interconnected LEC will also require the additional complement of equipment. All carriers' networks would have to be built up proportionally to accommodate a PIN-only dialing scheme for paging carriers; the cost of this additional equipment inevitably would be passed on to consumers in the form of higher rates.

DID vs PIN Call Completion Procedures

800 Number DID Call		800 Number PIN Call	
1.	Caller receives Dial Tone	1.	Caller receives Dial Tone
2.	Caller enters 1+ 10 digit number	2.	Caller enters 1+ 10 digit number
3.	Call is routed to a Access Tandem Switch	3.	Call is routed to a Access Tandem Switch
4.	Access Tandem performs database look-up and routes the call to the appropriate IXC	4.	Access Tandem performs database look-up and routes the call to the appropriate IXC
5.	IXC performs translation from 800 number to PSTN number	5.	IXC performs translation from 800 number to PSTN number
6.	IXC routes call to End User Service Provider	6.	IXC routes call to End User Service Provider
7.	End User Service Provider connects caller to the Service Subscriber (called party)	7.	End User Service Provider queries caller for Personal Identification Number (PIN) of Service Subscriber (called party)
8.	Call Completion	8.	Caller enters PIN
		9.	End User Service Provider performs database look-up to identify Service Subscriber

800 Number DID Call	800 Number PIN Call
	10. End User Service Provider connects caller to the Service Subscriber (called party)
	11. Call Completion

8.0

**PROHIBITING PERSONAL 800 NUMBER BY PAGING SUBSCRIBERS WILL
BE VERY DIFFICULT TO ENFORCE AND MAY BE WASTEFUL OF
NUMBERING RESOURCES**

After May 1, 1993, when 800 portability became mandatory, the use of "personal" 800 numbers by the public steadily increased. IXC's now regularly offer 800 numbers for subscribers to have toll-free access to their home or business. There are an undetermined number of people who have obtained 800 numbers directly from an IXC, then have that IXC "point" the 800 number to a local DID. That DID could be a home, business, cellular phone, fax, computer modem, etc. It could also be pointed at a DID assigned to a paging unit. The paging carrier has no way of monitoring this type of activity.

In order for a prohibition on personal 800 number use to be effective, it must be ensured that personal 800 subscribers don't simply change providers. If PageCo, for example, stopped selling personal 800 number service, customers who still wanted one could simply secure an 800 number directly from an IXC and point it to a regular geographic paging number. (The IXC would very likely be unaware of where the 800 number was pointed.) Indeed, IXC's are, today, offering 800 numbers that can be redirected by the user instantaneously.) Worse, such a scenario consumes both an 800 number and a local geographic number - TWO numbers to provide the same service that today is provided by a single number.

Eliminating points to paging NXX's would be very challenging. The IXC's would have to maintain databases of valid, current, local paging numbers and prevent their entry into 800 routing databases. This would be additional overhead on service management systems and would also further complicate administration of the North American Number Plan. Further, a truly persistent subscriber might secure yet another local number from the LEC to be used strictly for forwarding to the local paging number. Now, THREE numbers are consumed to provide a single personal 800 number.

The net result of prohibiting personal 800 numbers could be revenue shifting from the paging companies to the IXCs, personal inconvenience to paging subscribers, and greatly increased consumption of numbering resources.

9.0

NANP PLANNING AND NUMBER UTILIZATION

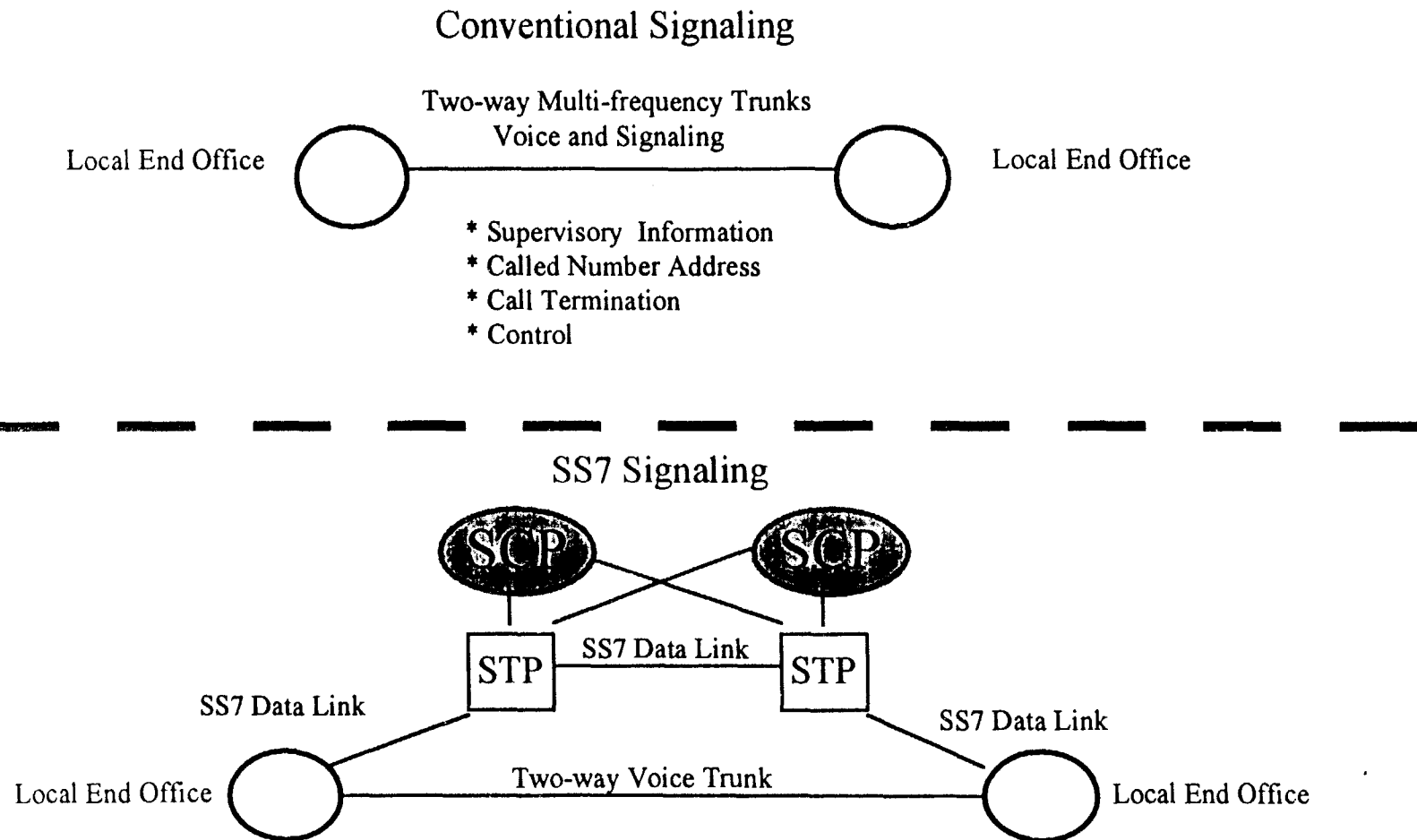
Toll free number resources are plentiful. INC has already allocated 64 million numbers for the 8XX series, which can be available within the same or similar time frames as 888, with proper planning. Further, 16 million additional toll free numbers can be made available through the use of 8XX-0XX and 8XX-1XX sequences. Lastly, with proper network planning any three digit number series can be toll free. The key in each instance is planning and actual implementation of any necessary changes. Clearly, now is the time to systematically lay out a mechanism for determining the sequence of toll free numbers that will be made after the 8XX numbers are utilized, and the methodology by which these numbers will be made available.

CONCLUSION

The public's demand for toll-free based services, including paging, is clearly evident by the popularity of 800-type numbers. Toll-free numbers are perceived universally as the easiest means of accessing a multitude of features while costing the caller nothing. It is therefore a natural conclusion that business users of all sizes would want to be "easy to access" through the use of a toll-free service number. The public wants to be able to access all segments of telecommunications in the easiest possible fashion. The public and competitive pressures also demand that paging providers be able to offer all of the enhanced services that are technically possible. Toll-free services provide all of these features. It is fully expected that the public will resort to creative and wasteful methods to accomplish DID access if toll-free numbers are not made readily available.

PIN-based paging services are technically inferior, less efficient in the use of PSTN network resources, anticompetitive because of the additional dialing requirements and preclude the use of SS7 technology for future paging and PCS enhanced services. For these reasons PCIA is opposed to any restriction or requirement that toll-free number access for paging services be limited to a PIN arrangement for subscriber calling.

Conventional And SS7 Signaling Configurations



Service Control Point (SCP) - Customer Service Description Database

Switching Transfer Point (STP) - Packet switch which transfer SS7 messages between network nodes.

Local End Office - Controls the switching function of the voice circuits. Has SS7 connection to STP.

Figure 1

Voice Mail Systems and DID 800 Numbers

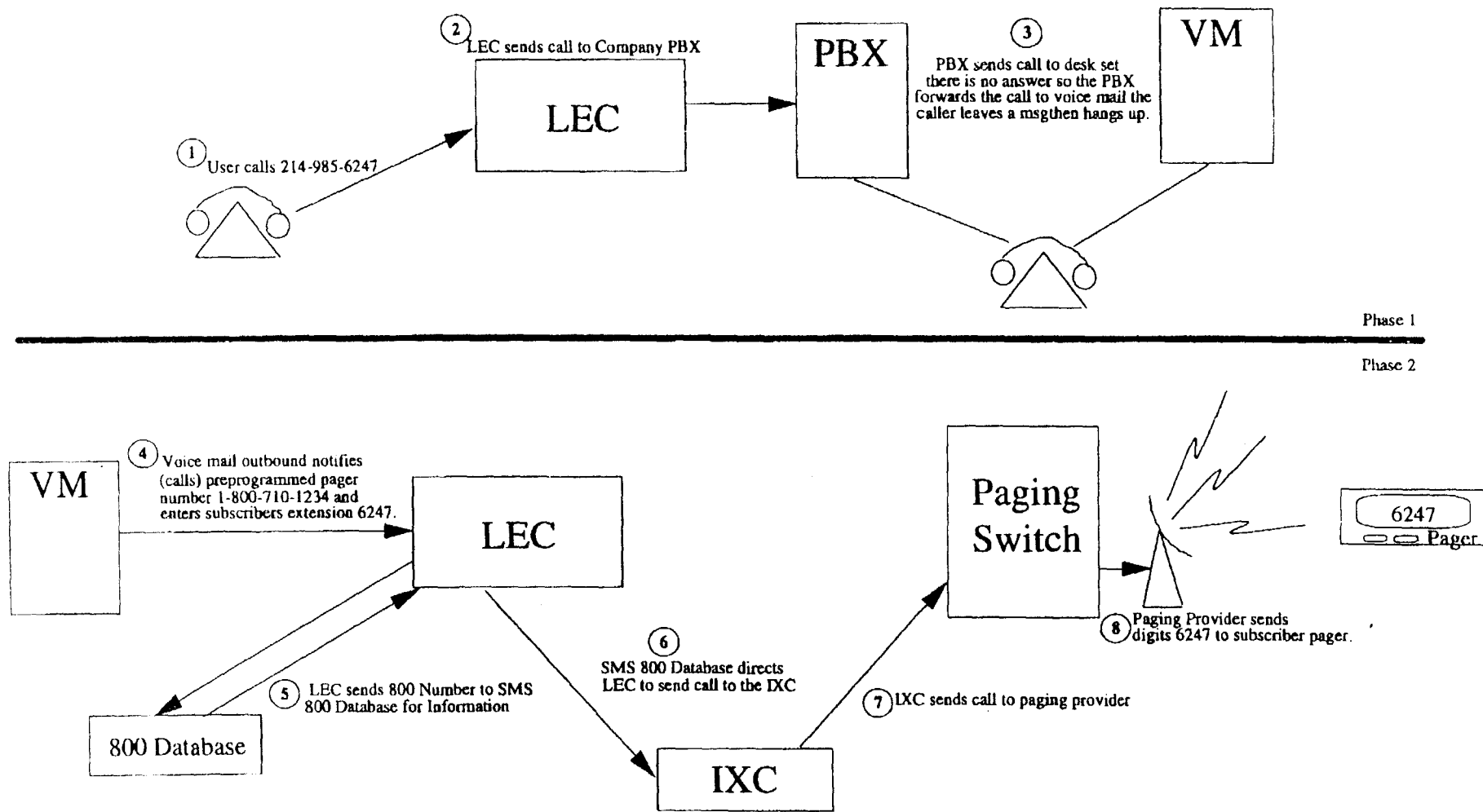


Figure 2

Efficiency Comparision of DID vs PIN 800 Arrangement

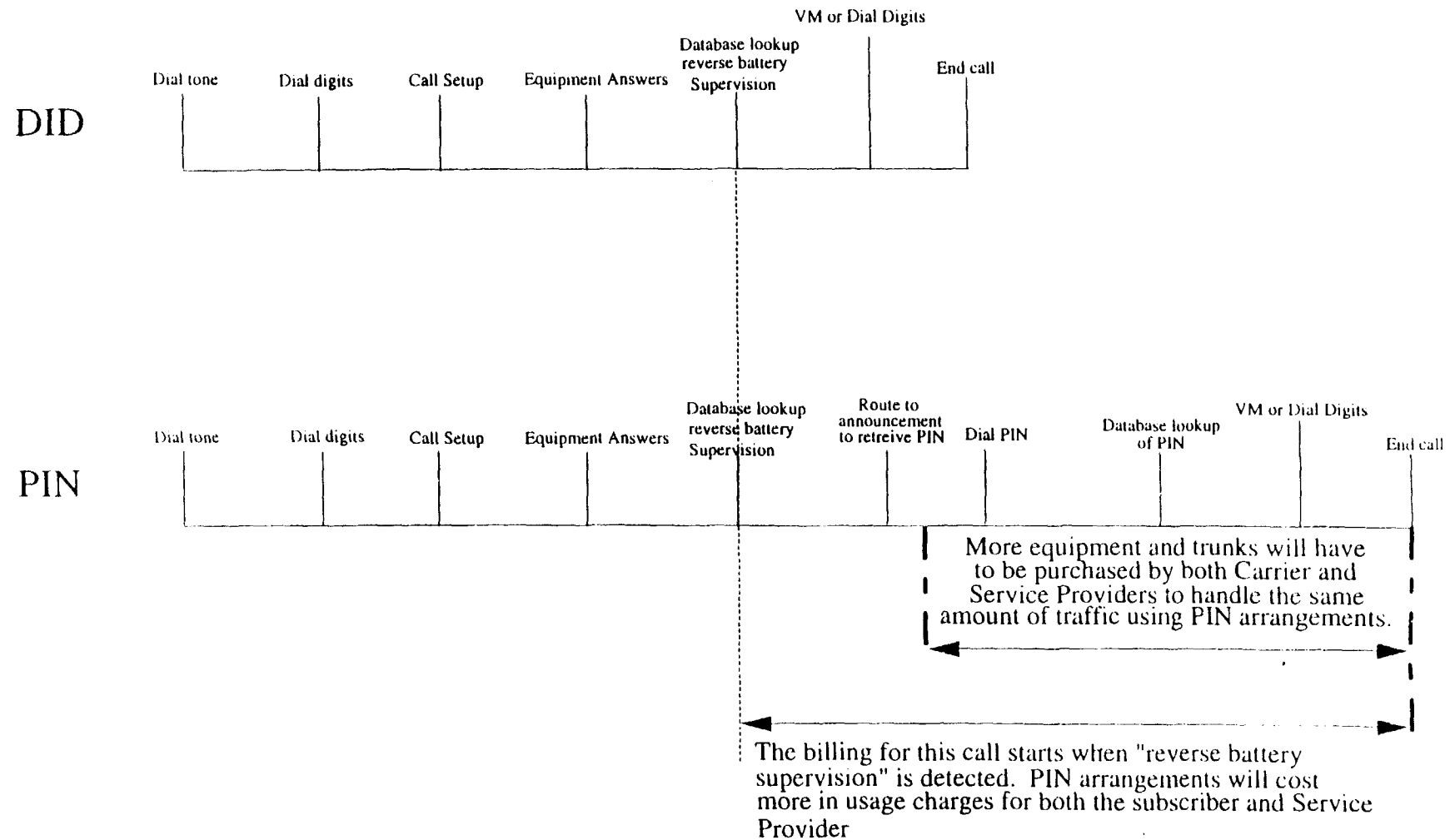


Figure 3

FEDERAL COMMUNICATIONS COMMISSION
WASHINGTON, D.C. 20554

IN REPLY REFER TO:

June 26, 1995

Mr. Michael Wade
President
Database Service Management, Inc
6 Corporate Place, Room PYA - 1F286
Piscataway, NJ 08854-4157

DOCKET FILE COPY ORIGINAL

Dear Mr. Wade:

On June 13, 1995, the Common Carrier Bureau (the Bureau) responded to the accelerating depletion of the remaining available 800 numbers by directing Database Service Management, Inc (DSMI) to limit to two hundred (200) per week the amount of 800 numbers a Responsible Organization (RespOrg) could assign collectively to either "working" or "reserved" status.

On June 21, 1995 the Bureau modified this plan at the request of certain industry segments that believed a more equitable and less disruptive plan was for the Bureau to adopt a "market share" allocation plan. We developed an interim allocation plan based on the market share of RespOrgs during July 1994, but which gave a minimum of 25 numbers per week to each RespOrg to assure that every RespOrg, even those created since July 1994 or those having little market share continued to receive some 800 numbers. The intent of this interim plan was to respond quickly to the industry while we continued to examine additional market share data that might permit a more refined solution.

On June 22, 1995, the Bureau was asked by some industry members to consider removing the limit of 3% of its working 800 numbers that any RespOrg can carry as reserved in the SMS database at any one time. Because each RespOrg now receives a fixed amount of 800 numbers each week and must certify at week's end that each 800 number is assigned to a working customer or has been returned to the SMS database, the 3% reservation limit is not needed at this time.

Michael Wade
Page 2.

By this letter, DSMI is directed to remove the 3% reservation limit while this market allocation plan remains in effect. Compliance with this order is to begin at 12:01 a.m., eastern time, Tuesday June 27, 1995.

We continue to seek ways to refine our 800 conservation program so that it can serve the industry's needs more effectively and preserve the public resource represented by 800 numbers until 888 numbers are available. Once again, thank you for your cooperation.

Sincerely,

A handwritten signature in cursive script, reading "Kathleen B. Levtiz".

Kathleen B. Levtiz
Deputy Chief, Policy
Common Carrier Bureau

ICCF

Industry Carriers Compatibility Forum

Under the auspices of the
Carrier Liaison Committee

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Industry Solutions

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555 NXX Assignment Guidelines

April 7, 1995 Revision

This revision includes the reclamation text developed by the Industry Numbering Committee (INC) in association with Issue # 029 - NANP Resource Reclamation.

TABLE OF CONTENTS

SECTION	TITLE	PAGE
1.0	PURPOSE AND SCOPE OF THIS DOCUMENT	3
2.0	ASSUMPTIONS AND CONSTRAINTS	3
3.0	ASSIGNMENT PRINCIPLES.....	4
4.0	CRITERIA FOR THE ASSIGNMENT AND RETENTION OF 555 NUMBERS	6
5.0	RESPONSIBILITIES OF 555 NUMBER ADMINISTRATOR	8
6.0	RESPONSIBILITIES OF 555 NUMBER APPLICANTS AND HOLDERS	10
7.0	RECLAMATION PROCEDURES.....	11
8.0	555 NUMBER CONSERVATION	11
9.0	MAINTENANCE OF THESE GUIDELINES.....	12
10.0	APPEALS PROCESS.....	12
11.0	GLOSSARY	13

Appendix A: 555 NXX ASSIGNMENT REQUEST AND CONFIRMATION FORMS

Appendix B: ANNUAL REPORT OF 555 LINE NUMBER ACTIVATION STATUS

1.0 Purpose and Scope of This Document

This document specifies guidelines for the assignment of line numbers within the 555 NXX code, hereafter referred to as '555 numbers' within these guidelines. The intended use for 555 numbers for which these guidelines apply include the provisioning of information services but may include a broad range of existing and future services as well. While these guidelines were developed by the telecommunications industry by consensus process at the Industry Numbering Committee (INC), they do not supersede controlling appropriate World Zone 1 governmental or regulatory principles, procedures and requirements. These industry consensus guidelines are expected to apply throughout World Zone 1 subject to procedures and constraints of the World Zone 1 administrations.

These guidelines apply only to the assignment of 555 numbers in geographic NPAs. This does not preclude a future effort to address non-geographic NPAs in the same guidelines.

These guidelines do not apply for the assignment of 555 numbers in N00 SACs.

2.0 Assumptions and Constraints

The development of the 555 number assignment guidelines include the following assumptions and constraints:

- 2.1** The 555 NXX Guidelines have been established as the result of an industry consensus that a unique number set (NPA-555-XXXX) is a solution to identified industry needs. The 555 NXX provides for types of public information service needs which may not be met by current numbering solutions, e.g., 976 and 900.
- 2.2** These guidelines are intended to apply until superseded by the appropriate industry or regulatory authority.
- 2.3** NANP numbering resources shall be assigned to permit the most effective and efficient use of a finite numbering resource in order to prevent premature exhaust of the 555 number resource and to delay the need to develop and implement a new number resource. Efficient resource management and 555 number conservation is necessary due to the industry impacts of expanding any numbering resource (e.g., finding an equivalent resource to supplement 555 numbers).
- 2.4** These guidelines treat only the assignment of 555 numbers. Implementation of the 555 number assignments is beyond the scope of these guidelines. These guidelines are not intended to address local dialing arrangements for 555 numbers.

- 2.5 The applicant must be licensed or certified to operate in the area, if required, and must demonstrate that all applicable regulatory authority required to provide the service for which the 555 number is necessary has been obtained.
- 2.6 The guidelines should provide the greatest latitude in the provision of telecommunications services while effectively managing a finite resource.
- 2.7 These guidelines do not address the issue of who will fulfill the role of Administrator(s) of the 555 number resource. The guidelines described herein were developed by the industry without any assumption on who should be the Administrator(s).
- 2.8 The assignment and management of 555 numbers will be administered in accordance with these guidelines by the 555 number Administrator(s). At the direction of the Administrator(s), the number holders/entities who are assigned 555 numbers will be requested to provide service activation information to the Administrator(s) on a periodic basis to ensure effective management of the 555 number resource. The Administrator(s) will use this information to effectively manage the use of 555 numbers and to advise the industry as to the level of assignments and to alert the industry to any concerns such as the potential for number exhaust.
- 2.9 Administrative assignment of the 555 numbers by an entity does not imply ownership of the resource by the entity performing the administrative function, nor does it imply ownership by the entity to which it is assigned. The assignee has the right to use an assigned number in accordance with these guidelines.
- 2.10 The assignment of 555 numbers remains in effect as long as the assignee is in compliance with the criteria set forth in these guidelines.

3.0 Assignment Principles

The following assignment principles apply to the 555 NXX Assignment Guidelines:

- 3.1 All number assignments are for 10-digit 555 numbers in the format NPA-555-XXXX. When a number is requested from the available resource and assigned, the 4-digit line number will be designated as either a national or a non-national number.
 - 3.1.1 A national number is a unique line number in the 555 NXX assigned to an entity for use in all or most of the geographic NPAs in World Zone 1. A number will be designated as a national number if it is to be used in at least 30% of all NPAs or states or provinces in World Zone 1. National numbers cannot be assigned by the Administrator to any other entity.

3.1.2 A non-national number is a line number in the 555 NXX assigned to an entity for use in a specific geographic area or areas (NPAs, states, or provinces). A number will be designated non-national if it is to be used in fewer than 30% of NPAs or states or provinces. Non-national numbers are available for assignment to multiple entities, assuming those entities wish to use the non-national number in different geographic NPAs.

3.2 In order to meet customer needs for the 555-XXXX resource and to ensure that entities served by both geographically large and small areas can have maximum access to the 555 resource, numbers will be available for assignment on a random basis. The criteria for administration of the 555 line numbers available for either national or non-national assignment will be as follows:

National numbers - The industry will be informed by the Administrator 24 months prior to the time the resource is projected to reach its 3000th line number so that the industry may determine what steps, if any, need to be taken.

Non-national numbers - When 70% of the first 1000 individual line numbers are in-service in a single NPA, an additional 1000 individual line numbers will be made available for assignment. When 1700 of the 2000 individual line numbers available for assignment have an appearance in a single NPA, an additional 1000 individual line numbers will be made available for assignment. Non-national number availability will be capped at 3000 individual line numbers pending review of the utilization of the resource by the appropriate industry body.

To conserve the 555 resource in a reasonable manner that also encourages maximum utilization of the resource, when 3000 individual 555 line numbers are projected to exhaust within 24 months in either category, the Administrator(s) will advise the industry with the purpose of convening the appropriate industry body to reevaluate the above guidelines. If it is determined at that time that the assignment guidelines do not meet the needs of the market, or conserve the resource in a reasonable manner, the appropriate industry body will determine what changes are necessary and change these guidelines accordingly.

3.3 555 numbers, as part of NANP numbers, are to be assigned only to identify initial destination addresses in the public switched telephone network (PSTN), not addresses within private networks.

3.4 555 numbers are a finite resource that should be used in the most effective and efficient manner possible. All applicants requesting 555 numbers will be required to provide the information as specified on the forms of these guidelines (See attached 555 NXX Request and Confirmation Forms).

- 3.5** A 555 number assigned in accordance with these guidelines must be activated, i.e., placed into service and remain in service, within the time limits specified herein. Otherwise, the 555 number will be subject to reclamation and/or reclassification (See Sections 5.4 and Section 7).
- 3.6** Information that is requested of applicants in support of 555 number assignment shall be kept to a minimum and shall be uniform for all applicants. Information received by the Administrator(s) shall be treated as confidential and adequately safeguarded.
- 3.7** 555 numbers shall be assigned in a fair and impartial manner to any applicant which meets the criteria for assignment as detailed in Section 4.0.
- 3.8** Applicants for 555 numbers must comply with applicable local, state, federal and World Zone 1 governmental regulations relative to the services they wish to provide.
- 3.9** Any entity that is denied the assignment of one or more 555 numbers under these guidelines has the right to appeal that decision per Section 10.
- 3.10** Assignments will be made on a first come, first served basis and there will be no reservation of 555 numbers. 555 numbers will be assigned from the available unassigned numbers. The Administrator(s) will attempt to match a number assignment with a specific number request.
- 3.11** In situations of geographic NPA relief activity accomplished by either NPA splits, overlays, or boundary realignments, the holders of a national number will retain the right to request activation of the same number in the newly created NPA. Non-national numbers shall be assigned in the new or realigned NPAs as follows:
- 3.11.1** For NPA splits or overlays, an entity holding a non-national 555 number in an existing geographic NPA will be given the opportunity to request assignment of the same 555 number in the new NPA. If this opportunity is declined, the 555 number in the new NPA will be available for assignment to another entity.
- 3.11.2** For NPA boundary realignment, an entity holding a non-national 555 number in the NPA affected by the realignment (i.e., the boundary shift reduces the serving area) will be given the opportunity to request assignment of the same 555 number in order to provide service in the newly aligned serving area that is part of the realignment, if the number is available. If the number is already assigned, then the entity must request the assignment of a new 555 line number in order to provide service in the newly aligned serving area.

4.0 Criteria for the Assignment And Retention of 555 Numbers

The assignment criteria in the following sections shall be used by the Administrator(s) in reviewing a 555 number assignment request for an initial and/or additional number.

- 4.1** In order to obtain a 555 number, the entity must complete the 555 NXX Request and Confirmation Form. The first five 555 line number assignments are classified as "initial" assignments. Entities may use single or multiple forms to apply for any or all of these first five 555 numbers. Requests for 555 number assignments beyond the first five 555 initial numbers are classified as "additional" assignments and should be requested on a separate form.
 - 4.1.1** The entity must certify a need for NANP numbers, e.g., provision of local or cellular service in the Public Switched Telephone Network. The assignment of 555 numbers will not apply for use in private networks.
 - 4.1.2** The entity must submit the 555 NXX Request and Confirmation Forms certifying that a need exists for a 555 number in order to provide services. In addition, the entity must certify a plan for activation within twelve (12) months from the date of number assignment.
 - 4.1.3** The entity must be licensed or certified to operate in the area, if required, and must demonstrate that all applicable regulatory authority required to provide the service for which the 555 number is required has been obtained.
- 4.2** The requirement in Section 4.1.3 is met if certification is required for activation of a 555 line number, and at the time of application the requestor attests that appropriate certification has been applied for and is expected to be granted in a timely fashion that will allow the applicant to activate the 555 line number before the expiration of the twelve (12) month initial activation period.
- 4.3** The intended use of 555 numbers include the provisioning of information services but may include a broad range of existing and future services as well.
- 4.4** Requests for number assignments beyond the first five (5) numbers must meet the following criteria:
 - (a) The request may be for up to a maximum of five (5) national and/or non-national numbers.
 - (b) For a national number an entity must have placed each previously assigned national number in service within 10% of the World Zone 1 geographic NPAs or states or provinces.

- (c) For a non-national number, an entity must have placed all previously assigned non-national numbers in service in the NPA in which they were requested or, if they were requested in multiple NPAs, in at least 10% of the NPAs in which they were requested.

- 4.5 The applicant's preference for a specific 555 number will be honored to the extent possible. In the event the applicant's preferred number is unavailable, the applicant may specify up to three alternative numbers in order of preference. If the preferred and alternative numbers are not available or the applicant does not indicate a preference for another specific number, the Administrator(s) will assign one.
- 4.6 A block of one hundred (100) 555 line numbers will be reserved as fictitious non-working numbers for use by the entertainment and advertising industries. These specific numbers are 555-01XX, i.e., numbers between and including 555-0100 and 555-0199.
- 4.7 If two or more applicants request the same 555 line number simultaneously, (i.e., their written requests are received by the Administrator on the same date), one of the applicants will be randomly selected to receive the requested 555 number.
- 4.8 In order to qualify for retention of a national number, the entity must meet the criteria for assignment as follows.

To retain national 555 number status:

1. The requesting entity will certify that its intent in obtaining a national 555 number is to deploy service on a national basis.
2. An entity, within eighteen (18) months of assignment, must have activated the 555 number in 30% of active World Zone 1 geographic NPAs or states or provinces as selected by the applicant.

For a non-national number assignment:

1. The requesting entity will certify that its intent in obtaining a non-national 555 number is to deploy service in a NPAs for which assignment was requested.
2. Within eighteen (18) months of assignment the entity must have activated the 555 number in all NPAs for which it has the assignment.

If an entity cannot meet the above criteria within the established time frames due to circumstances beyond its control, e.g., equipment delays, shortage of

required facilities, the inability of the carriers to provide service, etc., the entity may request a 6-month extension from the Administrator. The extension will be granted to the entity to resolve any of these issues that constrain it from meeting the deployment criteria. If the entity has not resolved the issues that constrain it from meeting the deployment criteria outlined above, but has shown good faith in attempting to resolve those issues, the entity may request, and the Administrator may grant, a second 6-month extension.

If the entity still has not resolved the issues that constrain it from meeting the deployment guidelines (with the exception of technical and/or business constraints outside its control), the Administrator will initiate a process for national numbers to reclassify the 555 number as a non-national number and place it in the non-national number pool as available for assignment in NPAs where it is inactive; and for non-national numbers to release all inactive assignments for assignment availability. See Section 7.

- 4.9 If the number of NPA(s), states or provinces where an entity's national number has been activated falls below the 30% threshold described in Section 4.8, excluding NPA relief activity, the Administrator shall notify the entity in writing of this fact and indicate the entity has sixty (60) days in which to satisfy the activation criteria or to demonstrate to the Administrator that a plan is in place to comply with the guidelines. Otherwise the number will be reclassified by the Administrator to a non-national number as outlined in Section 5.4.
- 4.10 If the assigned non-national number is not activated or does not remain activated in the NPAs for which originally requested, the Administrator shall notify the entity in writing of this fact and indicate the entity has sixty (60) days in which to satisfy the activation criteria or to demonstrate to the Administrator that a plan is in place to activate the number in the assigned NPAs. Otherwise the number should be voluntarily returned by the entity to the Administrator in those NPA(s) where the number was assigned but not activated and made available for future assignment. See Section 7.

5.0 Responsibilities of 555 Number Administrator

The Administrator(s) shall:

- 5.1 Provide copies of the 555 number assignment guidelines when requested and timely notification of changes to the industry.
- 5.2 The receipt of 555 number requests shall be tracked and assignments will be made on a first come, first served basis, except as noted in Section 4.7.
- 5.3 Upon receipt of the signed 555 NXX Request and Confirmation Form, the Administrator(s) shall process applications for a 555 number in the following manner:

- 5.3.1** Determine if the request is in compliance with 555 number assignment policies and guidelines contained herein.
 - 5.3.2** Respond within 10 working days from the date of receipt of a 555 NXX Request and Confirmation Form by completing the response portion that is part of these guidelines.
 - 5.3.3** The Administrator(s) will attempt to assign the preferred 555 number as listed on the 555 NXX Request and Confirmation Form. If the requested number is unavailable, the Administrator(s) will discuss with the applicant the assignment of an alternative number.
 - 5.3.4** Maintain records on 555 numbers assigned plus those available, and publish the assignments on an annual basis or make available upon request.
 - 5.3.5** If the application is approved and a 555 number is assigned, the Administrator(s) will complete the 555 NXX Request and Confirmation Form and forward to the applicant.
 - 5.3.6** In cases where a 555 number application is denied, provide specific reasons for the denial to the applicant on the form and refer the applicant to Section 9 of the guidelines, Appeals Process, for details on how and where to make an appeal of the decision.
- 5.4** It is expected that 555 numbers, when assigned, will be placed in service within twelve (12) months. Absent compliance with Section 4.8, reclassification process will be initiated by the Administrator(s) consistent with the following¹.
- 5.4.1** When reclassification is appropriate, the Administrator(s) will inquire from the entity regarding the status of the 555 number(s) and, a certified letter will be sent to the entity stating the reclassification process has been initiated and requesting the voluntary return of the number(s) from the NPAs in which they have not been activated. The letter will state that the Administrator(s) intends to reclassify the 555 number(s) as a non-national number(s) at the end of a sixty (60) day period if activation of the number has not been established in accordance with these guidelines. The entity will be notified by letter if the 555 number(s) assignment is subsequently reclassified.

¹ The reclassification process is defined as the procedure whereby the Administrator(s) as maintenance agent for the 555 number resource, reclassifies numbers which do not meet the requirements specified in the guidelines. Note: The Administrator(s) has the responsibility to attempt to reclassify the 555 number resource, especially numbering resources not activated, as the situation requires. These guidelines confer no enforcement authority. Actual enforcement authority resides with the appropriate governmental or regulatory body.

Any 555 number reclassified will be placed in the non-national number pool and will be made available for assignment as a non-national number by the Administrator(s) after an idle period of six months.

5.4.2 The reclassification process will entail the following:

5.4.2.1 The Administrator will inform the assignee that the unused number is now subject to assignment to another entity.

5.4.2.2 The Administrator will, if necessary, inform the involved regulator(s) of this action.

5.5 Return of 555 numbers which have been assigned but have not been activated in conformance with these guidelines, will be subject to the reclamation procedures outlined in Section 7.

5.6 In situations of geographic NPA relief activity accomplished by either NPA splits, overlays, or boundary realignments, the holders of a national number will retain the right to request activation of the same number in the newly created NPA. For entities holding non-national numbers, the Administrator will provide written notification within three (3) months after industry notification (e.g., NANPA Information Letter) to the entities in the affected NPAs concerning their opportunities to request the same 555 number(s) in the new or adjacent NPAs as follows:

5.6.1 For NPA splits or overlays, advise the entities of the opportunity to apply for the same 555 number in the new NPA by submitting a 555 NXX Request and Confirmation Form no later than three (3) months after the receipt of the notification letter.

5.6.2 For NPA boundary realignment, advise the entities of the opportunity to apply for the same 555 number in the NPA adjacent to the realigned boundary, if this number is available, no later than three (3) months after receipt of notification. For those situations where the numbers are not available, the entities will be advised to request new 555 numbers in the adjacent NPAs.

5.7 In all situations of NPA relief activity, the 555 numbers existing in the affected NPA(s) will not be assigned to entities in the new NPA(s) until the existing 555 number holders have been given the response opportunity stated in Section 5.6 above.

6.0 Responsibilities of 555 Number Applicants and Holders

Entities requesting new 555 number assignments as well as entities already assigned 555 numbers shall comply with the following: